

NS:ALK
F.#2020R00500

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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FILED

3:52 pm, Mar 10, 2021

U.S. DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

ROBERT MADISON and
TARA MADISON,

Defendants.

Cr. No. **1:21-cr-00130(NGG)(SJB)**
(T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(B)(vi), 841(b)(1)(C), 846,
853(a) and 853(p); T. 18, U.S.C., §§ 2
and 3551 et seq.)

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THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Heroin and Fentanyl)

1. In or about and between June 2020 and January 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ROBERT MADISON and TARA MADISON, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny1] propanamide ("fentanyl"), a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of fentanyl involved in the conspiracy attributable to the defendants as a result of their own conduct, and

the conduct of other conspirators reasonably foreseeable to them, was 40 grams or more of a substance containing a detectable amount of fentanyl.

(Title 21, United States Code, Sections 846, 841(b)(1)(B)(vi) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

2. On or about June 23, 2020, within the Eastern District of New York, the defendants ROBERT MADISON and TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

3. On or about July 2, 2020, within the Eastern District of New York, the defendant TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FOUR

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

4. On or about July 9, 2020, within the Eastern District of New York, the defendant TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FIVE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

5. On or about July 16, 2020, within the Eastern District of New York, the defendants ROBERT MADISON and TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SIX

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

6. On or about August 4, 2020, within the Eastern District of New York, the defendants ROBERT MADISON and TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more

controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SEVEN

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

7. On or about August 13, 2020, within the Eastern District of New York, the defendants ROBERT MADISON and TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT EIGHT

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

8. On or about August 19, 2020, within the Eastern District of New York, the defendant TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT NINE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

9. On or about August 26, 2020, within the Eastern District of New York, the defendants ROBERT MADISON and TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TEN

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

10. On or about September 2, 2020, within the Eastern District of New York, the defendants ROBERT MADISON and TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT ELEVEN

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

11. On or about September 15, 2020, within the Eastern District of New York, the defendants ROBERT MADISON and TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWELVE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

12. On or about October 16, 2020, within the Eastern District of New York, the defendant TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THIRTEEN

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

13. On or about November 11, 2020, within the Eastern District of New York, the defendant TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled

substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FOURTEEN

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

14. On or about November 25, 2020, within the Eastern District of New York, the defendant TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FIFTEEN

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

15. On or about December 3, 2020, within the Eastern District of New York, the defendant TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SIXTEEN

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

16. On or about January 6, 2021, within the Eastern District of New York, the defendant TARA MADISON, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance, and (b) a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

17. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such offenses, and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.


18. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been comingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL


FOREPERSON

SETH D. DUCHARME
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. O.136

F.#: 2020R00500
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

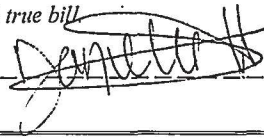
ROBERT MADISON and TARA MADISON,

Defendants.

INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(B)(vi), 841(b)(1)(C), 846, 853(a)
and 853(p); T. 18, U.S.C., §§ 2 and 3551 et seq.)

A true bill



Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Anna L. Karamigios, Assistant U.S. Attorney (718) 254-6225